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September 21, 2006

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* Notice of Alaska Communications Systems Group, Inc.

Petition of ACS of Anchorage, Inc. Pursuant to Section 10 of the Communications Act, as amended, for Forbearance from Section 251(c)(3) and 252(d)(1) in the Anchorage LEC Study Area, WC Docket No. 05-281

Dear Ms. Dortch:

On September 20, 2006, Liane Pelletier and Leonard Steinberg of Alaska Communications Systems Group, Inc. ("ACS"), Karen Brinkmann and Elizabeth Park of Latham and Watkins LLP, and Andrew Lundquist, met with Chairman Martin to discuss the above-referenced proceeding.

During the meeting, ACS described the extensive facilities-based local exchange competition in Anchorage. ACS's primary competitor, General Communication, Inc. ("GCI"), has cable and fiber facilities that are currently used, or could easily be used, to provide local exchange service to a significant number of both business and residential customers in each of the wire centers in the Anchorage study area.

ACS expressed its willingness and its need to negotiate commercial agreements with GCI for reciprocal access to facilities at market-based rates. However, GCI currently has the advantage in such negotiations of relying on mandated access to ACS's UNEs. A grant of forbearance from ACS's UNE obligations in Anchorage would put ACS and GCI on more equal footing and encourage meaningful negotiations. Given the significant level of current and future facilities-based competition, market forces will ensure that consumers will continue to be protected and that the public interest will be served.

LATHAM & WATKINS^{LLP}

Attached are copies of materials provided to Chairman Martin at the meeting. Please contact the undersigned if you have any questions regarding this submission.

Respectfully submitted,

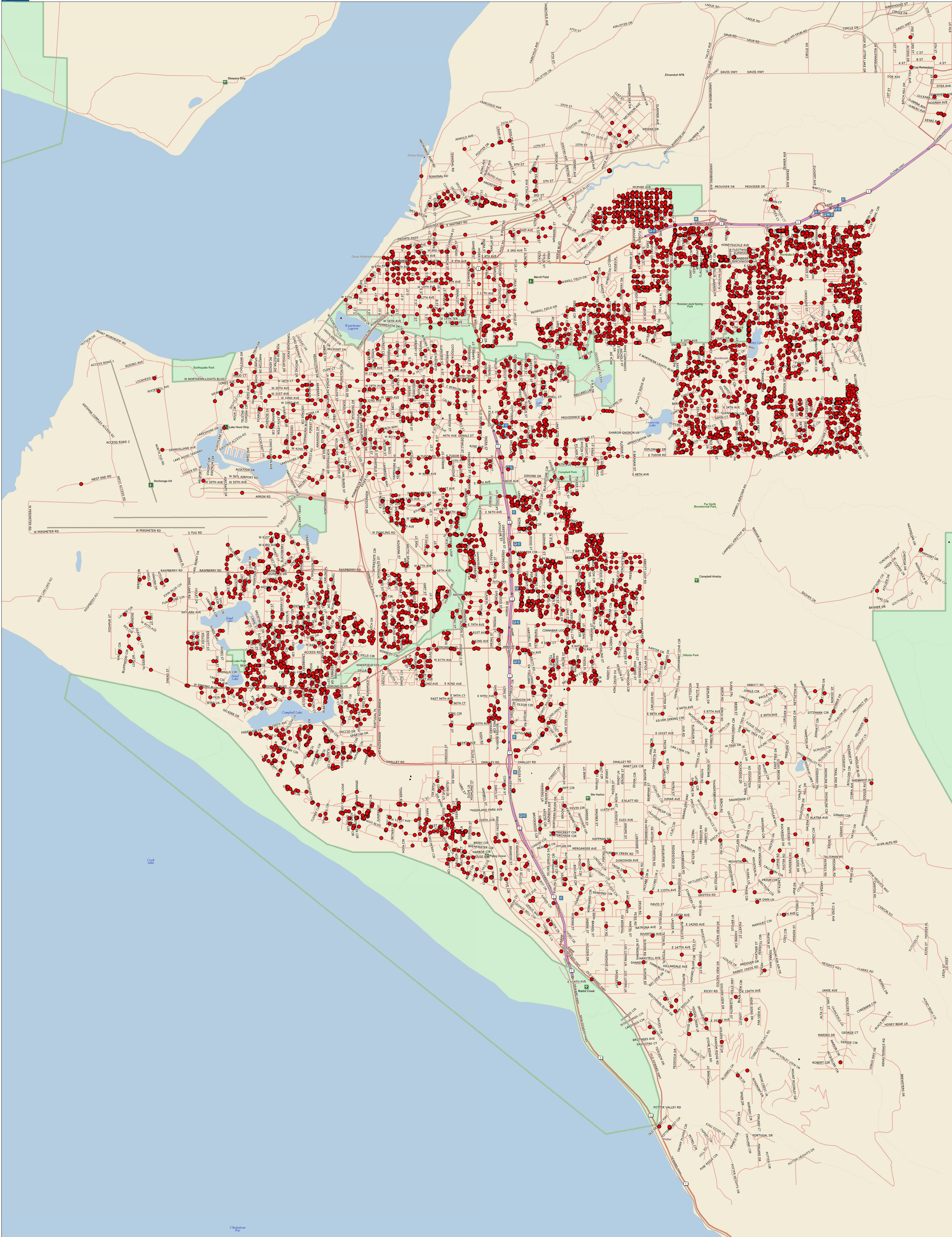
/s/

Karen Brinkmann

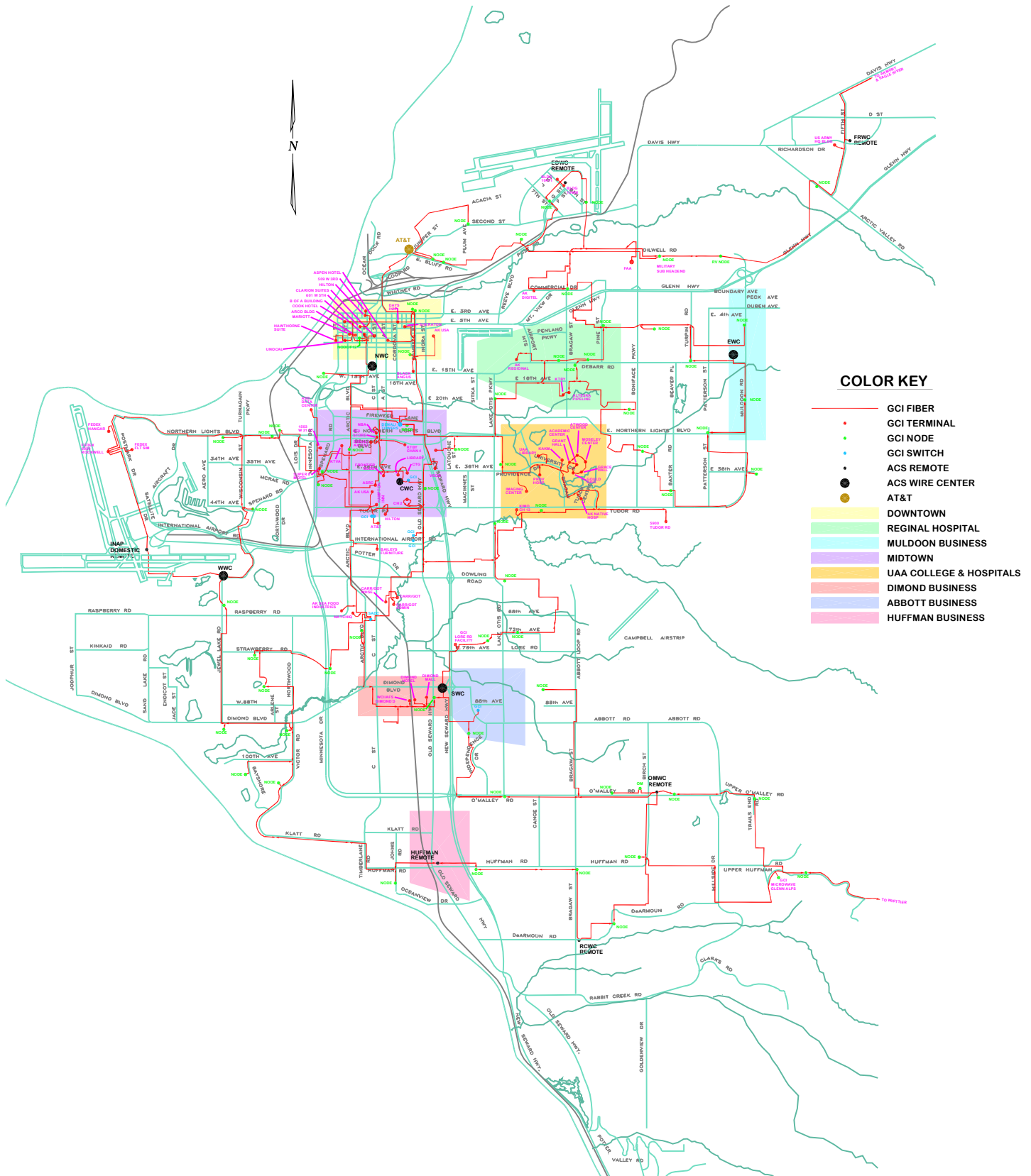
*Counsel to Alaska Communications Systems Group,
Inc. and ACS of Anchorage, Inc.*

Enclosures

cc: Chairman Kevin J. Martin
Michelle Carey



AS MAPPED BY ACS TECHNICIANS



GCI & ACS FIBER NETWORKS IN ANCHORAGE

AS MAPPED BY ACS TECHNICIANS

